

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DENISE E. THORPE, TH.D.,

Plaintiff,

v.

PITTSBURGH THEOLOGICAL
SEMINARY,

Defendant.

Civil Action No. 2:24-cv-00194-CCW

Honorable Christy Criswell Wiegand

Electronically Filed

Jury Trial Demanded

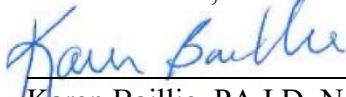
**DEFENDANT'S MOTION TO RECONSIDER OR, IN THE ALTERNATIVE,
TO CERTIFY FOR IMMEDIATE APPEAL**

Defendant Pittsburgh Theological Seminary (“Seminary”) hereby respectfully requests this Court to reconsider its order denying summary judgment in part (No.70) because the Court has used an incorrect standard or, in the alternative, to certify its order for immediate appeal to ask the Court of Appeals of the Third Circuit to clarify the proper test to determine ministerial status. An appropriate proposed Order and Memorandum of Law in support of its Motion follow.

June 30, 2025

Respectfully submitted,

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.



Karen Baillie, PA I.D. No. 66780
One PPG Place, Suite 1900
Pittsburgh, PA 15222
karen.baillie@ogletree.com
(412) 394-3333

SHERRARD, GERMAN & KELLY, P.C.

Suzanne L. DeWalt, PA I.D. No. 42072
535 Smithfield Street, Suite 300
Pittsburgh, PA 15222
sue.dewalt@sgkpc.com
(412) 258-6728

*Attorneys for Defendant Pittsburgh
Theological Seminary*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing **Defendant's Motion to Reconsider, or in the Alternative, to Certify for Immediate Appeal**, has been served on the following counsel of record via the Court's electronic filing system on this the 30th day of June, 2025:

James B. Lieber, Esquire
Thomas M. Huber, Esquire
Jacob Simon, Esquire
LIEBER HAMMER HUBER & PAUL, PC
1722 Murray Avenue, Second Floor
Pittsburgh, PA 15217
jlieber@lhhb-law.com
thuber@lhhb-law.com
jsimon@lhhb-law.com


Karen Baillie